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CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR  
61 BROADWAY, SUITE 3000  
NEW YORK, NEW YORK 10006  
212-344-7042

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BAX GLOBAL, INC. and BAX GLOBAL,  
S.A.

Plaintiffs,

v.

OCEAN WORLD LINES, INC.

Defendant

OCEAN WORLD LINES, INC.

Third Party Plaintiff

v.

COSCO Container Lines and COSCO North  
America, Inc.

Third Party Defendants

**07 cv 10457 (NRB)**

**ECF**

**OCEAN WORLD LINES  
ANSWER  
TO CROSS CLAIM**

Defendant OCEAN WORLD LINES (hereinafter “OWL”) by and through its attorneys, Cichanowicz, Callan, Keane, Vengrow & Textor, LLP, Answers the Third Party Defendants’ Cosco Container Lines Co., Ltd. and Cosco North America (hereinafter referred to as “Cosco”), cross claim, docket no 07 cv 10457 (NRB), upon information and belief, as follows:

1. OWL repeats and realleges each and every admission, denial, denial of knowledge or information and/or affirmative defense as set forth in its Answer to the Plaintiff’s

Complaint and its Third Party Complaints with the same force and effect as if herein set forth at length.

2. OWL denies all of the allegations against it in paragraph 27 of Cosco's Cross Claim, except admits that the misdelivery, damage or loss suffered by Plaintiff and/or Third Party Plaintiff as alleged in the Complaint and Third Party Complaint was caused by the fault, neglect, omission, or breach of contract by Third Party Defendants, their agents, servants, or employees.
3. OWL denies all of the allegations against it in paragraph 28 of Cosco's Cross Claim.

**WHEREFORE**, Defendant OWL prays that:

- a. Cosco's Cross Claim against OWL be dismissed;
- b. Cosco's Counter Claim against OWL be dismissed;
- c. Plaintiff's complaint against OWL be dismissed;
- d. OWL's counterclaim against Plaintiff be granted;
- e. OWL's Third Party Complaint against Cosco be granted;
- f. and that the Court may grant such other or further relief as may be just and proper.

Dated: New York, New York  
June 25, 2008

CICHANOWICZ, CALLAN, KEANE,  
VENGROW & TEXTOR, LLP  
61 Broadway, Suite 3000  
New York, New York 10006  
*Attorneys of Defendant Ocean World Lines*

By: S/ Stephen Vengrow  
Stephen H. Vengrow

**CERTIFICATE OF SERVICE BY ECF**

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.

2. On June 25, 2008, I served by ECF a complete copy of OCEAN WORLD LINES answer to the Cosco Cross Claim and Counter Claim the following attorneys at the ECF registered address:

Katten Muchin Rosenman LLP  
Attention: Philip A. Nemecek, Esq.  
575 Madison Avenue  
New York, New York 10022  
212-940-8800  
*Attorneys for Plaintiff*

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Phone: 212.885.5284 | Fax: 917.332.3834

DATED: June 25, 2008  
New York, New York

S/ Jessica De Vivo, Esq. (JAD/6588)